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December 29, 2020

VIA ECF

The Honorable Michael A. Shipp
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 19-17272-MAS-ZNQ

Dear Sir or Madam:

This firm represents Defendants in the above-referenced matter. On December 11, 2020, Counterclaim Defendant Rightscorp, Inc. filed a Motion to Dismiss Defendant's Counterclaims (ECF 136) that is currently returnable January 19, 2021 in light of Defendants obtaining an automatic extension under L. Civ. R. 7.1(d)(5). Rightscorp has requested an extension to for its reply brief to RCN's forthcoming opposition to January 26, 2020. RCN has consented to that request and further requested an extension of its opposition brief to January 12, 2020. Rightscorp has consented to that request.

Please find enclosed for the Court's consideration a proposed Consent Order Extending The Time To Oppose And Reply To Motion To Dismiss. We respectfully request that the Court enter the proposed form of Order.

Respectfully Submitted,

/s/ *Edward F. Behm, Jr.*

Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF